

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

IN RE: ETHICON, INC., PELVIC REPAIR
SYSTEM PRODUCTS LIABILITY LITIGATION

**Master File No. 2:12-MD-02327
MDL No. 2327**

THIS DOCUMENT RELATES TO
THE CASES ON THE EXHIBIT
ATTACHED HERETO

**JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE**

JOINT MOTION TO DISMISS WITH PREJUDICE

Plaintiffs, whose cases are listed on the attached Exhibit A, and Defendants, Johnson & Johnson, Ethicon, Inc., and/or Ethicon LLC (collectively, the ‘Ethicon Defendants’), jointly move to dismiss with prejudice all claims against the Ethicon Defendants in these cases which were, or could have been, asserted, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii). Each party shall bear her or its own costs.

Respectfully submitted,

/s/ Michelle A. Parfitt
Michelle A. Parfitt
Ashcraft & Gerel
4900 Seminary Rd., Ste. 650
Alexandria, VA 22311
703.931.5500
mparfitt@ashcraftlaw.com
Counsel for Plaintiffs

/s/ William M. Gage
William M. Gage (MS Bar #8691)
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4561
william.gage@butlersnow.com

/s/ Susan M. Robinson
Susan M. Robinson (W. Va. Bar #5169)
Thomas Combs & Spann PLLC
300 Summers Street
Suite 1380 (25301)
P.O. Box 3824
Charleston, WV 24338
(304) 414-1800
srobinson@tcspllc.com

Counsel for the Ethicon Defendants

CERTIFICATE OF SERVICE

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

EXHIBIT A

<i>Case Number</i>	<i>Case Style</i>
2:16-cv-05351	Abrams et al v. Ethicon, Inc. et al
2:14-cv-19923	Allen v. Ethicon, Inc. et al
2:13-cv-26963	Anderson et al v. Ethicon, Inc. et al
2:14-cv-20802	Baker v. Ethicon, Inc. et al
2:14-cv-20824	Bunting v. Ethicon, Inc. et al
2:14-cv-12065	Capobianco-Cosner v. Ethicon, Inc. et al
2:13-cv-23824	Croessmann (Westberg) et al v. Ethicon, Inc. et al
2:13-cv-26968	Gaumer et al v. Ethicon, Inc. et al
2:12-cv-08529	Gayle et al v. Ethicon, Inc. et al
2:13-cv-26370	Gordon et al v. Ethicon, Inc. et al
2:12-cv-06402	Graves et al v. Ethicon, Inc. et al
2:14-cv-21295	Harrison et al v. Ethicon, Inc. et al
2:14-cv-18513	Hinzman v. Ethicon, Inc. et al
2:13-cv-29546	Hoeflich et al v. Ethicon, Inc. et al
2:13-cv-26972	Hoffman v. Ethicon, Inc. et al
2:12-cv-05603	Jenkinson et al v. Ethicon, Inc. et al
2:15-cv-03366	Johnson v. Ethicon, Inc. et al
2:14-cv-27489	Jones v. Ethicon, Inc. et al
2:13-cv-26976	Lane et al v. Ethicon, Inc. et al
2:13-cv-24335	Laney v. Ethicon, Inc. et al
2:13-cv-07338	Lawson v. Ethicon, Inc. et al
2:14-cv-18247	Levitt et al v. Ethicon, Inc. et al
2:12-cv-08883	Magee v. Ethicon, Inc. et al
2:14-cv-21741	Mardaga v. Ethicon, Inc. et al
2:13-cv-33221	Panzano et al v. Ethicon, Inc. et al
2:14-cv-21773	Prescott-Walker v. Ethicon, Inc. et al
2:13-cv-26979	Radford et al v. Ethicon, Inc. et al
2:12-cv-09659	Rice et al v. Ethicon, Inc. et al
2:14-cv-22454	Roach et al v. Ethicon, Inc. et al
2:13-cv-26978	Roberts et al v. Ethicon, Inc. et al
2:16-cv-08999	Roberts et al v. Ethicon, Inc. et al
2:12-cv-05993	Smeaton et al v. Ethicon, Inc. et al
2:13-cv-26828	Underwood et al v. Ethicon, Inc. et al
2:14-cv-07037	Villalpando et al v. Ethicon, Inc. et al
2:14-cv-00461	Waits et al v. Ethicon, Inc. et al
2:14-cv-22412	Ward v. Ethicon, Inc. et al
2:14-cv-02267	West et al v. Ethicon, Inc. et al
2:14-cv-00459	Whitaker v. Ethicon, Inc. et al
2:14-cv-01389	Williams v. Ethicon, Inc. et al
2:13-cv-06248	Mattiello et al v. Ethicon, Inc. et al
2:14-cv-21395	Spinks et al v. Ethicon, Inc. et al
2:14-cv-00458	Wolinski et al v. Ethicon, Inc. et al